

## **EXHIBIT 5**

**EXHIBIT 5**



This is the 2<sup>nd</sup> Affidavit of  
DAN BRANDON BILZERIAN in this case  
and was made on October 17, 2024

No. S-245663  
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

Petitioner: DAN BRANDON BILZERIAN also known as DAN BILZERIAN

Respondents: IGNITE INTERNATIONAL BRANDS, LTD., INTERNATIONAL INVESTMENTS, LTD., GREGORY GILPIN-PAYNE, SCOTT ROHLEDER, ROBIN RODRIGUEZ, THOMAS BUNKER and RALPH GILPIN-PAYNE

**AFFIDAVIT**

I, Dan Brandon Bilzerian, of 5990 Patrick Lane, Las Vegas, Nevada 89118, United States, businessman, SWEAR (OR AFFIRM) THAT:

1. I am the Chairman and director of Ignite International Brands, Ltd. (the Company). I make this affidavit in response to the application of the Company and some of its shareholders to turn over control of the Company's social media accounts.
2. First, the individuals who have brought this application in the name of the Company do not have the authority to do so, as I am the sole Director.
3. I created the brand "Ignite", and created social media accounts for the Company and brand, including on X (formerly Twitter) and Instagram.
4. The social media accounts use my name, picture, and likeness in nearly every post. See attached as Exhibit A, various posts from the Company's Instagram account downloaded on October 17, 2024. The photographs and videos depict me (the man with the beard) and my lifestyle, which is (and has always been) the basis of the Company's business model and marketing campaign.
5. See attached as Exhibit B, various posts from the Company's X account, downloaded on October 17, 2024.
6. Given that the social media accounts primarily use and portray my name, picture and likeness, to promote the Company's lifestyle products and brand, I have always solely operated and currently operate and control the various social media accounts including creating and approving all content.
7. I do not consent to the Respondents, or other individuals within or outside the Company, using my name, picture or likeness on social media.

8. I am not promoting, marketing or developing any competing brands or products to Ignite's brand and products.
9. I tried to attend the unlawfully-called AGM that was held on August 22, 2024, via Teams, but was not allowed to speak, participate or vote.
10. In paragraph 7 of Gregory Gilpen-Payne's Affidavit sworn October 9, 2024, states that I "posted about another vape product that was not ready for sale". This is not true—the Smoore device in question had been available for sale from the manufacturer for five months at the time that I posted about it, but Paul Bilzerian and Scott Rohleder decided to sell the distributors an alternate device from VapeEZ, which cost Ignite over fifty cents more per unit and was an inferior device. I believe that they did this in order to receive personal benefits or kickbacks from VapeEZ.
11. I note that both Gregory Gilpen-Payne and Scott Rohleder have now resigned as Directors of the Company, Scott having been indicted by a grand jury for securities fraud (Exhibit "A" to my Affidavit sworn October 3, 2024), and Gregory having been named in the indictment (via the initials G.G.P.) as a "straw owner" of International Investments Ltd., which the indictment alleges operated at the direction of and for the benefit of Paul Bilzerian, who has also been charged.
12. I was not physically present before the commissioner but he was in my electronic presence utilizing video technology pursuant to the process for remote commissioning of affidavits specified in Appendix A of *Code of Professional Conduct for British Columbia*; and
13. I understand the solemnity of making the affidavit and the consequences of making an untrue statement.

SWORN (OR AFFIRMED) BEFORE )  
ME at North Vancouver, in the Province )  
of British Columbia, this 17<sup>th</sup> day of )  
October, 2024 )

A Commissioner for Taking Affidavits in  
the Province of British Columbia

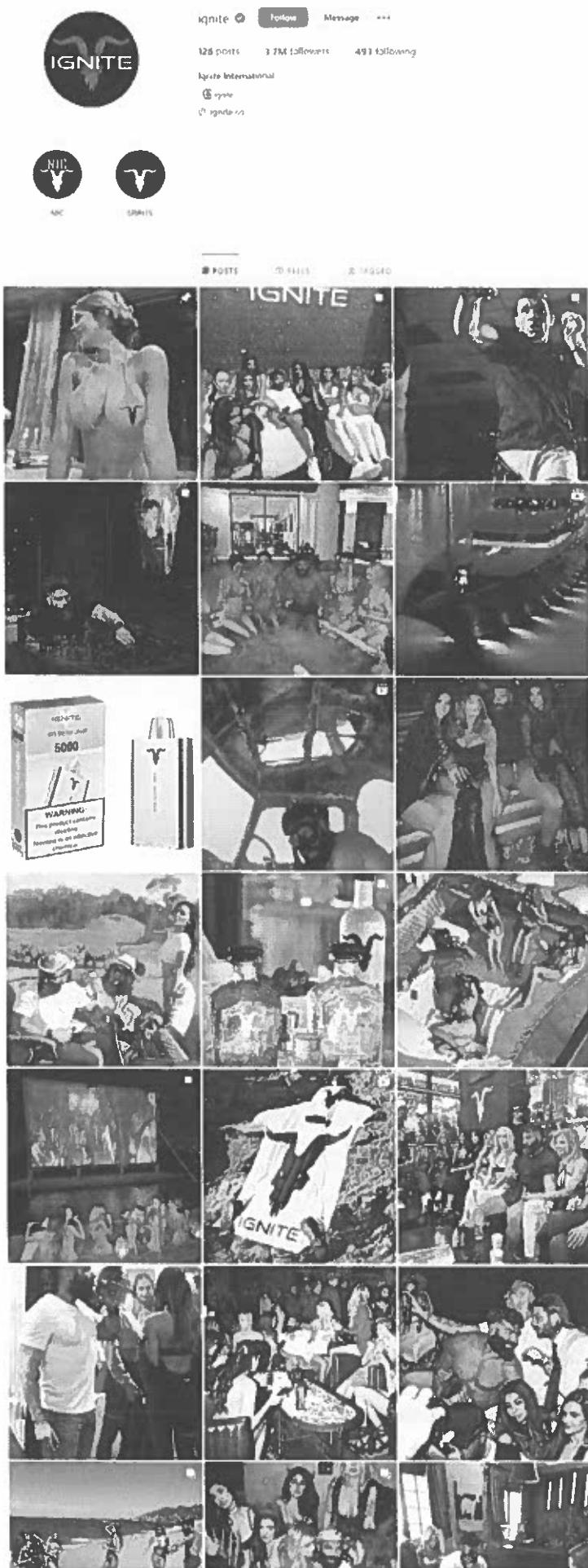
Ali Al-Samak



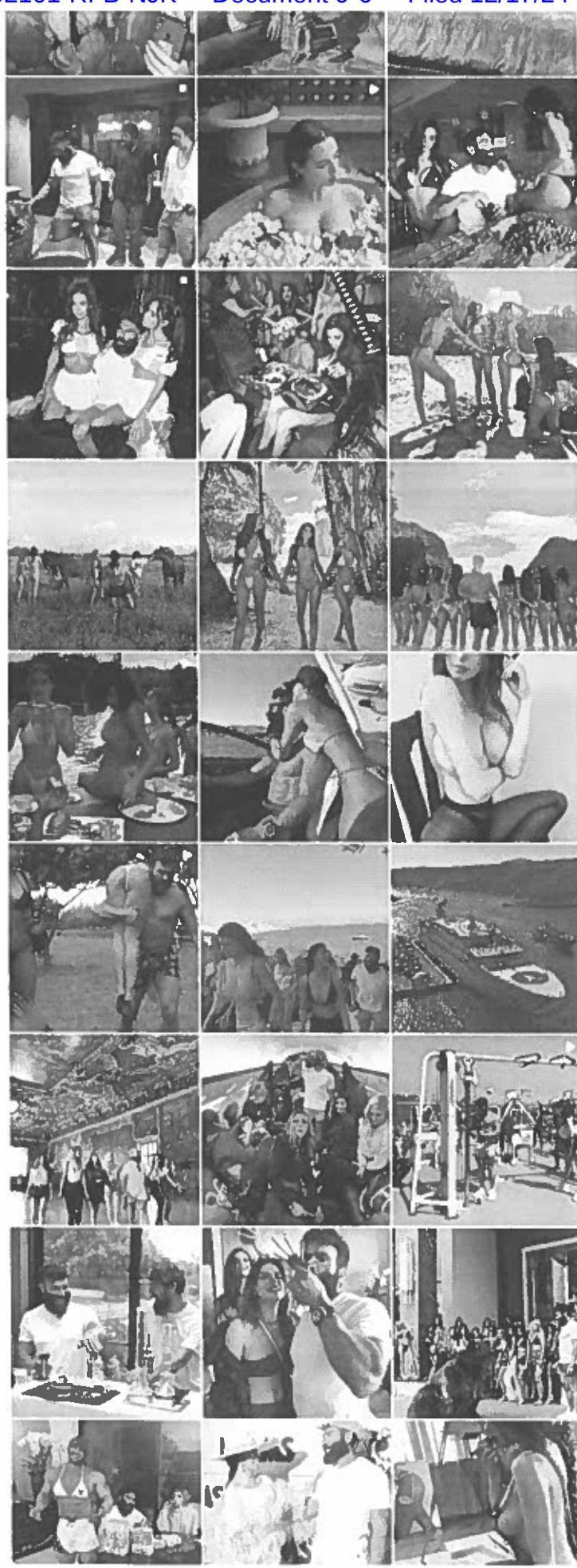
Dan Brandon Bilzerian

This Exhibit "A" referred to in the  
Affidavit # 2 of  
**DAN BRANDON BILZERIAN**  
SWORN/AFFIRMED before me by  
video technology this 17<sup>th</sup> day of  
October, 2024. The affiant was located in  
Las Vegas, Nevada, while the  
commissioner, Ali Al-Samak was located  
in the City of North Vancouver, in the  
Province of British Columbia.

  
A Commissioner for taking Affidavits









This Exhibit "B" referred to in the  
Affidavit # 1 of  
**DAN BRANDON BILZERIAN**  
SWORN/AFFIRMED before me by video  
technology this 17<sup>th</sup> day of October, 2024.  
The affiant was located in Las Vegas,  
Nevada, while the commissioner, Ali Al-  
Samak was located in the City of North  
Vancouver, in the Province of British  
Columbia.

  
A Commissioner for taking Affidavits in  
British Columbia

X

Ignite International

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Your Life, Your Way, 121-4 Deane Drive, Indianapolis, IN 46256, United States

Follow

Ignite International

47 following · 20.4K followers

Posts · Replies · Media

Ignite International (@igniteintl) • 20 posts

Something we're working on... Coming

Profile picture: A man in a dark polo shirt and light-colored pants standing outdoors.

Post 1: Ignite International (@igniteintl) • 2023-05-25

Post 2: Ignite International (@igniteintl) • 2023-05-25

Post 3: Ignite International (@igniteintl) • 2023-05-25

Post 4: Ignite International (@igniteintl) • 2023-05-25

Post 5: Ignite International (@igniteintl) • 2023-05-25

Post 6: Ignite International (@igniteintl) • 2023-05-25

Post 7: Ignite International (@igniteintl) • 2023-05-25

Post 8: Ignite International (@igniteintl) • 2023-05-25

Post 9: Ignite International (@igniteintl) • 2023-05-25

Post 10: Ignite International (@igniteintl) • 2023-05-25

Post 11: Ignite International (@igniteintl) • 2023-05-25

Post 12: Ignite International (@igniteintl) • 2023-05-25

Post 13: Ignite International (@igniteintl) • 2023-05-25

Post 14: Ignite International (@igniteintl) • 2023-05-25

Post 15: Ignite International (@igniteintl) • 2023-05-25

Post 16: Ignite International (@igniteintl) • 2023-05-25

Post 17: Ignite International (@igniteintl) • 2023-05-25

Post 18: Ignite International (@igniteintl) • 2023-05-25

Post 19: Ignite International (@igniteintl) • 2023-05-25

Post 20: Ignite International (@igniteintl) • 2023-05-25

Melanie Pavlos

Architecture & Tradition

Maxim

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ignite International (@ignite.intl) • Sep 28, 2023



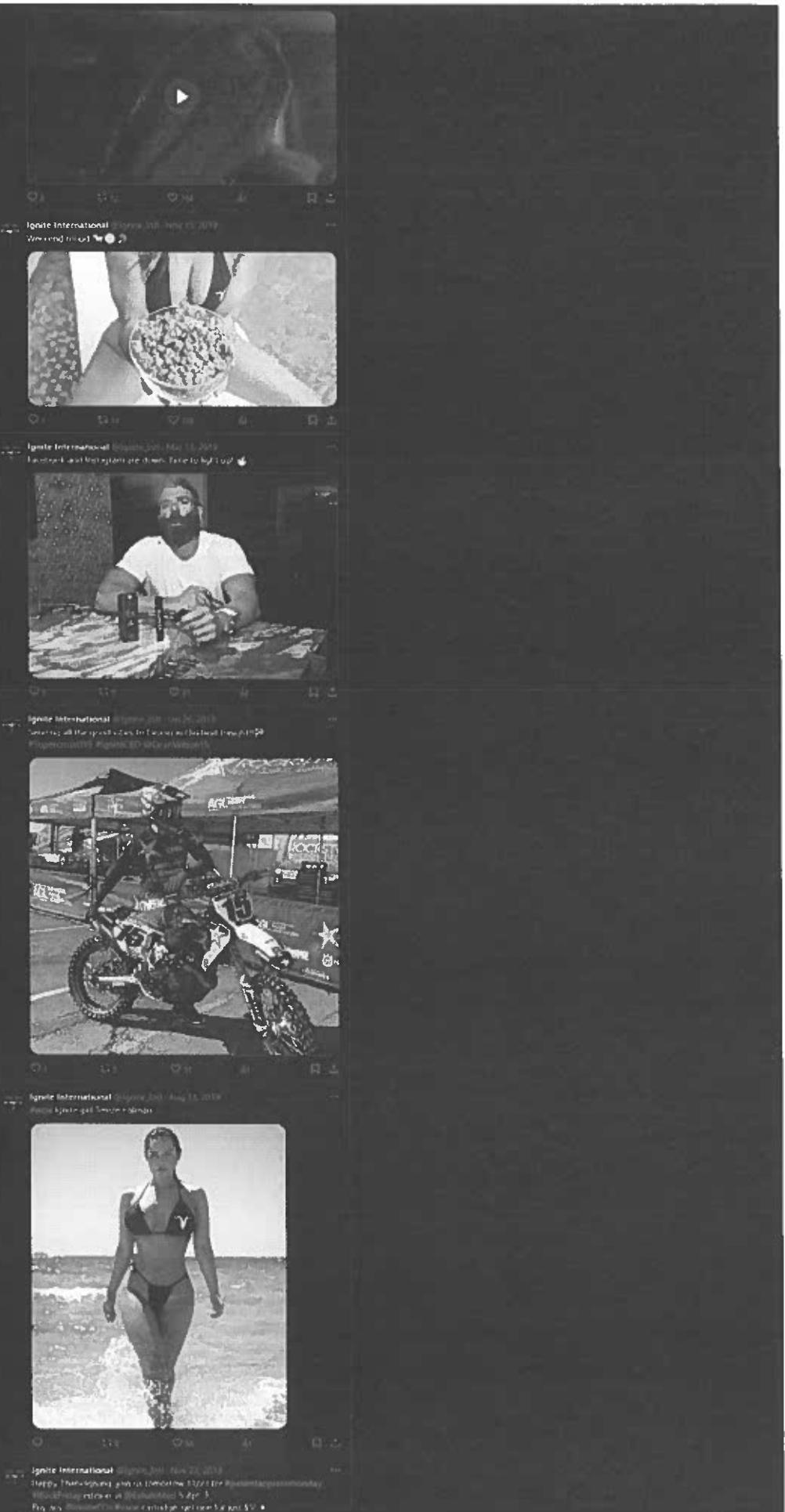
ignite International (@ignite.intl) • Mar 16, 2019  
Post of Lee-Ann (@ignitedk) via @DownWithIt\_Traffic\_Live\_Holy  
#IGNITE #IGNITE



ignite International (@ignite.intl) • May 26, 2019  
Post of Lee-Ann (@ignitedk) via @DownWithIt\_Life  
#IGNITE #IGNITE

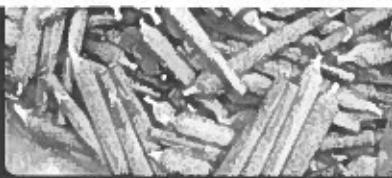


ignite International (@ignite.intl) • Sep 13, 2020  
Are you ready? [www.igniteinternational.com](http://www.igniteinternational.com)









Ignite International @ignite\_intl Apr 26, 2020



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The Arkansas Community Solutions Act and Employment Act  
proposes, which would completely remove marijuana from the Schedule  
I substances Act, is currently awaiting the City Congress final review.

motorcycle commons images



O 111 64

Ignite International Ignite\_198 - Apr 20, 2019



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Ignite International Ignite\_198 - Jul 24, 2019

Photo Ignite Cell @DmawesMoze



O 111 64

Ignite International Ignite\_198 - Jul 3, 2019

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